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Secretary,
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Reference: MM docket #96-222

Dear Sirs/Madams:

This is a comment for MM Docket #96-222.

In recent actions by the FCC, there have been comments made by broadcasters That any restrictions in the way they do business, (or for that matter, how many stations they can own,) would hurt investment. This includes possible dire consequences of any restrictions on LMAs and or duopolies. They also indicate that they serve the public interest in return for their use of the airwaves. I write to contradict and to answer those contentions with anecdotal evidence. The situation in Detroit, and probably in many other places in the country, would indicate that broadcasters have shown themselves to be avaricious, self-centered people who care nothing about local concerns or about quality of life in the communities they claim to serve.

I was an on-air personality in Detroit on the former classical music station WQRS. After the passage of the Telecommunications Act of 1996, a feeding frenzy of Radio Station owners began. WQRS was sold 5 times in 18 months for prices that kept increasing from 14 million dollars at first to 35 million Dollars only a year and a half later. The station owners were investors, not broadcasters. WQRS cleared a 2 million dollar profit the year before the format changed. My "share" of the 35 and up market on my weekend shift was 5.3. This is great for ANY format, but for Classical, it was unheard of. After all those sales, the current owners changed the format to "alternative rock" and their current 12 up share (according to the newspapers) is LESS than 1.4, and the station was no longer in the top 20. WQRS was almost never out of that top 20 group.

WQRS also served the public interest, not only in the Arts, but also by doing top of the line community service broadcasting and fund raising for worthy causes for all the years we were on the air. We were truly a community treasure. I have listened to the new station as much as I could stand to see what they do for the community. As far as I can see, the answer is: nothing. They do no news or public interest programming. I have yet to hear any public service broadcasting. The owners do not live here, and show no sign of caring about this community.

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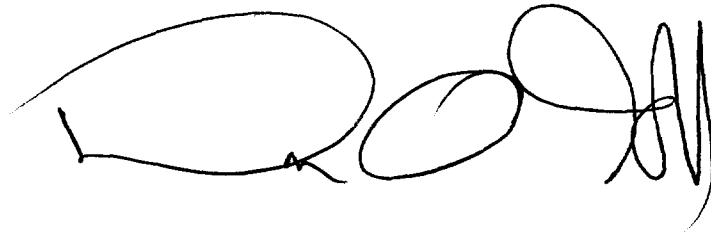
So what's wrong with the Radio business? In my opinion the answer is: too much business, not enough radio. Broadcasters come nowhere near measuring up to their claims of serving the public interest. They have caused FAR more harm than good, and using their track record as a reference it is extremely dangerous to allow them to operate with no restrictions. As to their claim that investment would be hurt, a petty thief might say the same thing if the law tried to take back what he stole. Controlling the actions of broadcasters would hurt no investment made in the public interest.

I would like very much to make this a formal presentation either in person or in writing. Please let me know what the procedure is to do that. That is, of course, another problem: broadcasters know how to do these things, but the ubiquitous "Man on the Street" often does not. I would like to request assistance in the process of making sure the people are heard.

I want to assure you that many people in Southeast Michigan feel the same, and also assure you that the point of view of the NAB is not shared by many of the public.

"Nearly all men can stand adversity, but if you want to test a man's character, give him power."— Abraham Lincoln

Thank you for your attention

A handwritten signature in black ink, appearing to read 'Davis Gloff'. The signature is fluid and cursive, with a large initial 'D' and a stylized 'G'.

Davis Gloff

Enc: copy of a Detroit News column on the subject

By George Cantor

Did market really make WQRS change to rock?



There is a simple question that keeps occurring to me about the recent upheaval at WQRS-FM, in which the Detroit area's only classical music station switched to a rock format. The question is: Who sent for you?

The station blubbered that it really didn't want to do it. The market made it. It couldn't get the numbers to work.

Of course. Isn't that always the way? You make a truly lousy business deal, and it is very hard to get the numbers to come out right. But don't blame the market. Why buy the station in the first place?

Who sent for you?

Here was a station that for 37 years did make the numbers work quite nicely. It established a secure niche in local radio, built up a listening audience that was small but with incredible demographics.

Now comes Greater Media Inc., which overpays for the station to such an extent that it can no longer afford a listening audience of that size. And it has the gall to blame the market.

The masterminds back at corporate headquarters send out the poor guy who is the local representative, have him speak several words of gibberish about how this actually will enhance the choices available on Detroit radio, then retreat to their sanctum, secure in the knowledge that they are financial geniuses. Genius is not quite the word I'd use.

It is interesting that just when television is finally enhancing the scope of choice available to the average cable subscriber, radio is narrowing it down. It was always the other way around. But now you can choose from a fairly wide menu on TV. While on radio you have rock, talk and a pack of boobs sitting around and speculating about the possible draft choices of the Indianapolis Colts.

When excellence does surface on the dial, new ownership usually appears to stomp it out. Look at the masterminds who took over the management at WXYT and fired David Newman, who is simply the best in the business. They didn't know the market, didn't understand Newman's appeal. But they're geniuses. Their mirror tells them so every morning.

The choice at WQRS is especially fascinating because if you pay attention to the popular culture you can detect a reawakening of interest in serious music among a younger audience. In several movies - Philadelphia, Moonstruck, Pretty Woman come immediately to mind - opera is used as a metaphor for the epitome of romantic love. Paul McCartney has produced a symphonic work, and Billy Joel says that's what he intends to do.

The Michigan Opera Theater and Detroit Opera House are showing that high culture can work in helping to revive downtown.

It doesn't seem to compute at WQRS.

This is exactly the same thing that is slowly destroying professional sports. Ego-driven owners sign athletes for far more money than they ever conceivably could return to the ballclub. Then the owners complain because they're losing their shirts and start demanding that someone build them a new ballpark.

Maybe it's not a theme for grand opera. But most radio station and sports owners would fit quite nicely in the title role of I Pagliacci. All they'd need is the drum. They're already wearing the rest of the outfit.